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USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: <u>4/28/11</u>

April 8, 2011

VIA FACSIMILE

Honorable Victor Marrero
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street, Suite 660
New York, New York 10007

Re: ***Hausler v. JP Morgan Chase Bank, N.A., et al.***
09 Civ. 10289 (VM)

Dear Judge Marrero:

We are counsel to the Petitioner in the above-referenced proceedings and, in follow up to the Court telephone conference held Wednesday April 6, 2011, write to advise of the briefing schedule to which the parties have agreed, and to seek Court approval of that schedule.

Moving papers: filed by no later than April 15, 2011

Opposing/cross moving papers: filed by no later than May 18, 2011

Reply/Opposing papers: filed by no later than June 3, 2011

Reply on cross-motions: filed by no later than June 17, 2011

As mentioned during the conference call, Petitioner intends to make three separate motions for judgment on the pleadings/summary judgment: (1) balance of Tranche I (Shanghai Pudong Bank); (2) Tranche III; and (b) National Bank of Canada Petition. Each motion will include a moving brief of no more than 15 pages, none of which will repeat, but will cross-reference arguments when possible. Opposing briefs/cross-moving briefs will be no more than 25 pages (if combined with all respondents per motion) or 15 pages (if not combined in a single response per motion) and reply briefs will be no more than 10 pages. As the Court directed, arguments previously made by any party may be raised and preserved by cross-reference or incorporation by footnote or otherwise.

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On behalf of all counsel for the parties, we respectfully request that the Court approve this schedule and procedure.

Respectfully submitted,



James W. Perkins

cc: James L. Kerr, Esq. (by e-mail)
Ramin Afshar-Mohajer, Esq. (by e-mail)
David A. Baron, Esq. (by e-mail)
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Alfonso Perez, Esq. (by e-mail)
Wilfredo Rodriguez, Esq. (by e-mail)
Joanne W. Young, Esq. (by e-mail)

SO ORDERED.

4-28-11
DATE



VICTOR MARRERO, U.S.D.J.